

AB:IC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and 960)

ADDERLY RAFAEL SANTOS FAMILIA,

22-MJ-1339

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

RAYMOND FRATTOLILLO, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about December 14, 2022, within the Eastern District of New York and elsewhere, the defendant ADDERLY RAFAEL SANTOS FAMILIA did knowingly and intentionally import one or more controlled substances into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”) and have been involved in the investigation of numerous cases involving drug trafficking, including cocaine investigations and drug trafficking through airports. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about December 14, 2022 at approximately 4:00 PM, the defendant arrived at Terminal 8 in John F. Kennedy International Airport (“JFK”) in Queens, New York aboard American Airlines Flight AA2443 from Punta Cana, Dominican Republic.

3. During the screening process as part the defendant’s entry into the United States, officers with the United States Customs and Border Protection (“CBP”) approached the defendant in the baggage claim area and asked him where he was coming from and what his purpose was in the United States. The defendant stated that he arrived from the Dominican Republic and was visiting family. CBP officers asked the defendant whether all of the belongings he had brought with him were his, and the defendant confirmed that they were. The defendant was asked whether anyone had asked him to carry or bring any baggage or items, to which the defendant responded no. CBP officers also asked the defendant whether the defendant had brought any tobacco, food items, cash or alcohol into the country, and the defendant responded that he had not.

4. CBP officers then asked the defendant to search his belongings, which consisted of a black backpack and black duffel bag, which he carried with him on the flight, and a black rolling suitcase that the defendant had checked. Inside the duffel bag, CBP officers discovered two neck pillows, one green and one black, that felt weighted. CBP officers opened

the neck pillows and discovered that there were small white packets of a white substance that were mixed into the stuffing of the neck pillows. CBP officers also opened two stuffed toys that contained the same mixture of small white packets of a white substance and stuffing. A photograph of the mixture of packets and stuffing described, as well as the emptied toys, is shown below:



The white substance inside one of the packets field-tested positive for cocaine. When asked about the contents of the neck pillows, the defendant stated that he had gotten the neck pillows from his children.

5. CBP officers also discovered a white substance contained in fabric panels that were attached into the lining of the defendant's backpack and duffel bag. Similar fabric panels were also discovered attached to a tablecloth, carpet, two garment bags, a drawstring bag and two wallets that were contained inside the defendant's duffel bag. A photograph of the fabric panels lining one of the garment bags, the drawstring bag and the backpack (from left to right), as well as the bags and backpack themselves, is shown below:



The white substance inside one of the fabric panels field-tested positive for cocaine.

6. In total, the packets and fabric panels weighed over nine kilograms.

7. Subsequently, HSI agents responded, and the defendant was placed under arrest.

WHEREFORE, your deponent respectfully requests that the defendant  
ADDERLY RAFAEL SANTOS FAMILIA be dealt with according to law.

RAYMOND J  
FRATTOLILLO  
JR

Digitally signed by  
RAYMOND J FRATTOLILLO  
JR  
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RAYMOND FRATTOLILLO  
Special Agent  
United States Department of Homeland Security,  
Homeland Security Investigations

Sworn to before me  
on December 15, 2022

*Taryn A. Merkel*

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THE HONORABLE TARYN A. MERKL  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK